

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNIVERSAL CIPHER, LLC,

Plaintiff,

vs.

WALMART, INC.

Defendant.

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Case No: 2:19-cv-00164

PATENT CASE

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT**

Plaintiff, Universal Cipher, LLC (“UC”), by its undersigned counsel, respectfully moves for an extension of time for Defendants to file an answer or otherwise respond to Plaintiff’s Complaint in this matter, and in support thereof, states:

Universal Cipher filed its complaint on May 7, 2019 and served its complaint upon Walmart on May 9, 2019, making Walmart’s response due May 30, 2019. Counsel for the parties conferred and filed on May 29, 2019 its first stipulation for Walmart to respond to the Complaint by July 1, 2019 [Dkt 004]. Counsel for the parties further conferred and filed on June 26, 2019 a second extension of time for Walmart to respond to the Complaint on or before July 16, 2019 [Dkt 005].

Counsel for the parties have further conferred and now respectfully request the Court grant this fourth 30-day extension of time for Walmart to respond to the Complaint on or before September 16, 2019. The relief is sought to allow the parties to actively engage in settlement discussions. The parties agree that such discussions have been productive and continued discussions may result in settlement for the matter.

The Parties agree to this motion and the proposed extension is not sought for the purpose of

delay. In addition, no pre-trial deadlines have been set in this matter and should not be affected by the requested extension.

WHEREFORE, for the reasons set forth herein, Plaintiff respectfully requests an extension of Defendants Walmart, Inc.'s deadline to answer or otherwise respond to the Complaint to and including September 16, 2019. A proposed order is attached.

Dated: August 13, 2019

Respectfully submitted,

/s/ Jay Johnson

JAY JOHNSON

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that the undersigned counsel conferred with counsel for Defendant and counsel for Defendant does not oppose this motion.

/s/ Jay Johnson

JAY JOHNSON

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 13, 2019, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Jay Johnson

JAY JOHNSON